

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

County of Monroe v. Purdue Pharma L.P., et al.,
Case No. 18-op-45158 (N.D. Ohio)

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

**PLAINTIFF'S MOTION FOR LEAVE TO FILE OMNIBUS MEMORANDUM IN
OPPOSITION TO DEFENDANTS' MOTIONS TO DISMISS**

Pursuant to Local Rule 5.2, Plaintiff seeks leave of Court to file its Omnibus Memorandum in Opposition to Defendants' Motions to Dismiss ("Opposition") in the above-captioned case under seal on July 9, 2018. Plaintiff files this Motion and Proposed Order (attached as **Exhibit A**) to ensure compliance with Case Management Order ("CMO") No. 2 (ECF No. 441) and the Protective Order Re: DEA's ARCOS/DADS Database (ECF No. 167).

Upon completion of the meet-and-confer process with Defendants regarding any disputes about what information should be kept confidential, Plaintiff will file a redacted version of said Opposition in the public record. Plaintiff respectfully requests the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiff respectfully requests that the Honorable Court grant Plaintiff's Motion for Leave to File Omnibus Memorandum in Opposition to Defendants' Motions to Dismiss Under Seal.

DATED: July 9, 2018

Respectfully submitted,

ROBBINS GELLER RUDMAN
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s/ Aelish M. Baig
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 9, 2018, the foregoing was filed using the Court's CM/ECF filing system and will be served via the Court's CM/ECF filing system on all attorneys of record.

s/ Aelish M. Baig
AELISH M. BAIG
Counsel for Plaintiff